



University of Hawaii at Manoa

Environmental Center
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August 30, 1988
RP:0093

Mr. James K. Ikeda, Acting Chief
Environmental Protection and
Health Services Division
Department of Health
P. O. Box 3378
Honolulu, Hawaii 96801

Dear Mr. Ikeda:

Water Quality Certification (WQC) Application
Wailua River Hydroelectric Power Project
Wailua, Kauai

The Environmental Center reviewed the Draft Environmental Impact Statement (EIS) for the above cited project, the construction of a hydroelectric power plant on the Wailua River, in March 1986. In that review, we called attention to the impacts associated with the proposed minimum flows that would be allowed to bypass the diversion. Additionally, we suggested that potential impacts to archaeological resources might result from the proposed construction. Both these concerns were adequately addressed in the subsequent response to our review provided by Island Power Co. Inc.

With regard to the Water Quality Certification (WQC) issue now under consideration, the minimum bypass flow of 10 cfs set forth in the Draft EIS was revised in the Final EIS to 15 cfs, and, furthermore, the Final EIS stated (p. B-59) that no diversion would take place unless the total flow exceeded 45 cfs:

"On the South Fork, flows would not be diverted unless the project condition discharge exceeds the sum of the minimum turbine discharge (30 cfs) plus the conservation flow (15cfs) for a total flow of 45 cfs. Below this project condition discharge value, the flows will pass unaffected to downstream reaches. The maximum diversion discharge would be the sum of the maximum turbine discharge (30 cfs) plus the conservation discharge (15 cfs) totaling 45 cfs."

Mr. James K. Ikeda

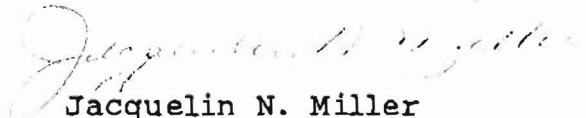
-2-

August 30, 1988

We note that this restriction was also included in the Application for a Department of Army Permit (PODCO-O 1953-SD) dated September 29, 1986.

There is no mention of this minimum flow limitation in the present Section 401 WQC Application. Recognition of this minimum flow limitation and restrictions on diversion should be included and fully recognized in the WQC Application prior to issuance of the Section 401 WQC. We bring this diversion limitation to your attention, because compliance with the minimum bypass flows is of critical environmental importance.

Yours truly,



Jacquelin N. Miller
Associate Environmental Coordinator

cc: OEQC
DLNR
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